



Sheppard, Mullin, Richter & Hampton LLP
1901 Avenue of the Stars, Suite 1600
Los Angeles, California 90067-6055
310.228.3700 main
310.228.3701 fax
www.sheppardmullin.com

Jill M. Pietrini
310.228.3723 direct
jpietrini@sheppardmullin.com

File Number: 85LZ-361988

December 16, 2022

By ECF

The Honorable Lorna G. Schofield
United States District Judge
U.S.D.C. - Southern District of New York
40 Foley Square
New York, NY 10007

Re: **North Star IP Holdings, LLC v. Icon Trade Services LLC,**
Case No. 1:22-cv-07324-LGS

Dear Judge Schofield:

We represent Plaintiff and Counter-Defendant North Star IP Holdings, LLC (“North Star”) and Third-Party Defendants Jalapeno Pizza Holdings LLC and Jalapeno Pizza LLC (collectively, “Third-Party Defendants”). The undersigned counsel for North Star and Third-Party Defendants submits this status letter jointly with counsel for Defendant, Counterclaimant, and Third-Party Plaintiff Icon Trade Services LLC (“Icon”) pursuant to the Court’s order of October 28, 2022 and the Court’s Individual Rule IV.A.2.

(a) What discovery has taken place, specifically:

(1) What discovery requests have been propounded, who propounded each request and on what date. On November 3, 2022, North Star served its first set of requests for production of documents and things (“RFPs”), interrogatories, and requests for admission (“RFAs”) on Icon. On November 3, 2022, Icon served its first set of RFPs and interrogatories on North Star and Third-Party Defendants.

(2) What responses were made, who made each response and on what date. On December 5, 2022, Icon served its objections and responses to North Star’s first set of RFPs, interrogatories, and RFAs. On December 5, 2022, North Star and Third-Party Defendants served their objections and responses to Icon’s first set of RFPs and interrogatories.

(3) The volume of documents produced, who produced the documents and when. On December 5, 2022, Icon produced documents labeled ICON_00000001-ICON_00000813. On December 14, 2022, North Star and Third-Party Defendants produced documents labeled NSRM0000001-NSRM0001171.

SheppardMullin

The Honorable Lorna G. Schofield
December 16, 2022
Page 2

(b) The procedural history of the case to date, specifically:

(1) What pleading have been filed, who filed each pleading and on what date.

On August 26, 2022, North Star filed its complaint against Icon. Dkt. 1. On September 9, 2022, Icon filed its answer to the complaint and filed counterclaims and a third-party complaint against North Star and Third-Party Defendants, respectively. Dkt. 12, 13. On September 29, 2022, North Star filed its first amended complaint against Icon. Dkt. 23. On October 13, 2022, Icon filed its answer to the first amended complaint. Dkt. 28. On November 4, 2022, North Star and Third-Party Defendants filed their answer to Icon's counterclaims and third-party complaint. Dkt. 42.

(2) What motions, if any, have been filed, who filed each motion and on what date each motion was filed. To date, no motions have been filed.

(3) What motions, if any, are currently pending and, for each pending motion, the date it was or is scheduled to be fully briefed. No motions are currently pending.

(c) The parties' plan to ensure that they meet the Court ordered discovery deadlines.

The parties plan to complete their production of responsive documents, subject to their objections, by December 23, 2022. The parties plan to take depositions, if any, related to North Star's infringement claims, Icon's affirmative defenses thereto, and Icon's first counterclaim, by January 21, 2023.

Very truly yours,

/s/Jill M. Pietrini

Jill M. Pietrini

SMRH:4869-8550-3300.1

cc: Counsel of Record (By ECF)